



November 27, 2024

Via ECF

The Honorable Valerie Figueredo
United States District Court Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: *Panini America, Inc. v. Fanatics, Inc. et al.*, Case No. 1:23-cv-09714-LTS
(S.D.N.Y. 2023); *Fanatics Collectibles TopCo, Inc. v. Panini S.p.A.*, Case No.
1:23-cv-06895-LTS (S.D.N.Y. 2023)**

Dear Judge Figueredo:

We write on behalf of the Panini entities (“Panini”) in the above-referenced matters to request permission to file under seal an unredacted version of Panini’s letter response to ECF No. 131 (the “Letter Response”) and five letters attached thereto. These letters relate to a dispute that arises out of a production services agreement between Panini and its trading card manufacturer GCP. The parties to this agreement agreed it would be treated as confidential. *See* Ex. 1 at 21, ¶ B(a). The five letters at issue refer to confidential terms of the production services agreement and contain sensitive business communications. Further, the Letter Response itself contains limited sensitive business communications relating to the confidential production services agreement, which Panini requests be redacted. Accordingly, Panini respectfully submits that good cause exists to file under seal the Letter Response and the exhibits to the Letter Response.

Pursuant to the Court’s individual rules, Panini is filing proposed sealed documents electronically through the Court’s ECF system. Panini is also filing a redacted version of the Letter Response publicly on the docket.

Respectfully submitted,

/s/ Eric Brenner
Eric Brenner

MEMO ENDORSED

A handwritten signature in blue ink, appearing to read "Valerie Figueredo", written over a horizontal line.

**HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE**

Dated: 5/21/2025

The motion to seal is GRANTED. The exhibits refer to confidential terms of the production services agreement and contain sensitive business communications. *See, e.g., FuboTV Inc. v. Walt Disney Co.*, No. 24-CV-01363 (MMG), 2024 WL 1884974, at *1 (S.D.N.Y. Apr. 30, 2024) (sealing documents that “contain commercially sensitive and confidential business information, specifically documents that concern Fubo’s carriage agreements with Defendants and proprietary financial analyses, marketing data, and business strategies”); *Nielson Consumer LLC v. Circana Grp., L.P.*, No. 22-CV-3235 (JPO)(KHP), 2024 WL 3887152, at *3 (S.D.N.Y. Aug. 20, 2024) (granting a sealing motion because the information the parties sought to seal pertained to “confidential business dealings”). The Clerk of Court is directed to maintain the viewing restrictions on ECF No. 77 in 23-CV-6895 and ECF No. 133 in 23-CV-9714. The Clerk of Court is directed to terminate the motions at ECF No. 76 in 23-CV-6895 and ECF No. 132 in 23-CV-9714.